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COUNTY OF SANTA CLARA
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10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12 (SAN JOSÉ)

13 BRIAN CHAVEZ, et al.,

14 Plaintiffs,

15 v.

16 COUNTY OF SANTA CLARA,

17 Defendant.
18

No. 15-CV-05277 RMI

**STIPULATION AND ~~PROPOSED~~
ORDER RE: BRIEFING SCHEDULE**

19 This stipulation and proposed order are submitted by Don Specter, counsel for Plaintiffs'
20 Class, and Deputy County Counsel, counsel for Defendant County of Santa Clara (hereafter Parties)
21 pursuant to Northern District Local Rules of Court 7-7 and 7-12. The Parties hereby stipulate as
22 follows:

23 1. The Parties stipulate to move the hearing date on Plaintiffs' Motion for Contempt
24 (Dkt. No. 155) currently scheduled for February 10, 2026 so that they can participate in mediation
25 efforts currently schedule for January 6, 2026, which – if successful – may obviate the need for a
26 motion.

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2. The parties stipulate to the following briefing schedule and hearing date as follows:

Defendants' Opposition: February 10, 2026

Plaintiffs' Reply: February 24, 2026

New Hearing Date: March 10, 2026

SO STIPULATED.

Dated: December 15, 2025

Respectfully submitted,

TONY LOPRESTI
County Counsel

By: /s/ Aryn Paige Harris

ARYN PAIGE HARRIS
Deputy County Counsel

Attorneys for Defendant
COUNTY OF SANTA CLARA

Dated: December 15, 2025

PRISON LAW OFFICE

By: /s/ Don Specter

DON SPECTER

Attorneys for Plaintiffs

CERTIFICATION

Pursuant to Civil Local Rule 5-1(i)(3), I attest that the concurrence of Don Specter in the filing of this stipulation has been obtained.


Dated: December 15, 2025

By: /s/ Aryn Paige Harris

ARYN PAIGE HARRIS
Deputy County Counsel

PURSUANT TO STIPULATION, IT IS SO ORDERED

Dated: December 16, 2025


ROBERT M. ILLMAN
United States District Court Judge

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